IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al*, Debtors.	Chapter 11 Case No. 26-10371 (TMH) (Jointly Administered)
RELIZ TECHNOLOGY GROUP HOLDINGS INC., et al., Plaintiffs, v. 1548199 ALBERTA LTD. and ROBERT J. BERTRAM, Defendants.	Adv. Pro. No. 26-50224 (TMH) **Hearing Date: December 1, 2026, at 10:00 am (ET)** **Objection Deadline: November 24, 2026, at 4:00 pm (ET)**

GELLERT SEITZ BUSENKELL & BROWN, LLC'S MOTION TO WITHDRAW AS COUNSEL FOR 1548199 ALBERTA LTD. AND ROBERT J. BERTRAM

Gellert Seitz Busenkell & Brown, LLC, ("GSBB" or the "Firm") hereby moves pursuant to Rule 9010-2(b) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), Rule 1.16(b) of the ABA Model Rules of Professional Conduct (the "ABA Rules"), and Delaware Lawyers' Rules of Professional Conduct 1.16(b)(4)(5)(6) and (7) (the "Delaware Rules"), for entry of an order, substantially in the form attached hereto, permitting GSBB to withdraw as counsel to claimants, 1548199 Alberta Ltd. and Robert J. Bertram ("Claimants"), in the above-captioned bankruptcy case. In support thereof, GSBB respectfully states as follows:

1. On March 20 2026, GSBB first made an appearance on behalf of 1548199 Alberta Ltd. and Robert J. Bertram [D.I. 78].

2. GSBB has diligently represented Claimants' interests in this matter.

3. Delaware Rule 1.16(b) sets for the criterion for counsel's termination of its representation, including that withdrawal can be accomplished without material adverse effect on the interests of the client and where good cause exists.

4. Claimants have failed to substantially fulfill their financial obligations to GSBB regarding GSBB's services and continued representation of Claimants would result in an unreasonable financial burden on GSBB. Moreover, good cause exists for withdrawal as a result of the development of irreconcilable differences between GSBB and Claimants. As a result, GSBB is no longer able to represent Claimants effectively. These matters have been disclosed and thoroughly discussed by the undersigned with Claimants, and undersigned has further advised Claimants of their right to obtain substitute counsel.

5. As a result of the attorney-client privilege, counsel seeking withdrawal may not be able to disclose the specifics or nature of the conflict giving rise to irreconcilable difference which warrant withdrawal. *See, e.g., Alonso v. Alonso*, 2022 WL 3699351 at *1 (S.D. Fla. Jan. 10, 2022); *Horan v. O'Connor*, 832 So. 2d 193, 193 (Fla. Dist. Ct. App. 2002). Courts have accepted this practice as a ground to withdraw. *See also, Hallmark Capital Corp. v. Red Rose Collection, Inc*., 1997 WL 661146, at *3 (S.D.N.Y. Oct. 21, 1997) (court may permit withdrawal solely on the basis of "irreconcilable differences" and "it is not necessary for the Court to decide who or what caused the irreconcilable differences."); *Generale Bank v. Wassel*, 1992 WL 42168, at *1 (S.D.N.Y. Feb. 24, 1992); *Dowler v. Cunard Line Ltd.*, 1196 WL 363167, at *1 (S.D.N.Y. June 28, 1996).

6. Accordingly, an attorney may simply cite that irreconcilable difference exists between the client and the attorney and that representation can be sufficient to establish that good cause exists for the withdrawal. *Horan*, 832 So.2d at 194.

7. Claimants have been notified in advance of counsel's intent to withdraw.

8. The undersigned respectfully submits that granting the requested relief will not unduly prejudice Claimants or materially disrupt the progress of this case. Undersigned counsel will promptly provide Claimants with all relevant files.

9. GSBB will serve this Motion on Claimants pursuant to the provisions of Local Rule 9010-2(b).

WHEREFORE, Gellert Seitz Busenkell & Brown, LLC, requests the Court to enter an Order allowing them to withdraw as counsel to 1548199 Alberta Ltd. and Robert J. Bertram in the above-referenced matter.

Dated: November 10, 2026 GELLERT SEITZ BUSENKELL & BROWN, LLC

/s/ Michael Busenkell

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Counsel for Claimants

IN THE UNITED STATES BANKRUPTCY COURT
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RELIZ TECHNOLOGY GROUP HOLDINGS INC., et al., Plaintiffs, v. 1548199 ALBERTA LTD. and ROBERT J. BERTRAM, Defendants.	Adv. Pro. No. 26-50224 (TMH)

ORDER GRANTING GELLERT SEITZ BUSENKELL & BROWN, LLC'S MOTION TO WITHDRAW AS COUNSEL FOR 1548199 ALBERTA LTD. AND ROBERT J. BERTRAM

Upon consideration of *Gellert Seitz Busenkell & Brown, LLC's Motion to Withdraw as Counsel for 1548199 Alberta Ltd. and Robert J. Bertram* (the "Motion") filed by Gellert Seitz Busenkell & Brown, LLC, and any responses thereto, and the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); it is hereby ORDERED that:

1. The Motion is GRANTED.

2. Gellert Seitz Busenkell & Brown, LLC. and all attorneys at the firm who entered appearance on behalf of 1548199 Alberta Ltd. and Robert J. Bertram in this case are hereby authorized to withdraw as counsel of record.

3. The Clerk of Court is directed to remove Gellert Seitz Busenkell & Brown, LLC and its attorneys from the service list and all applicable electronic notice systems in this case as counsel for 1548199 Alberta Ltd. and Robert J. Bertram.

4. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

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FOR THE DISTRICT OF DELAWARE

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RELIZ TECHNOLOGY GROUP HOLDINGS INC., et al., Plaintiffs, v. 1548199 ALBERTA LTD. and ROBERT J. BERTRAM, Defendants.	Adv. Pro. No. 26-50224 (TMH) **Hearing Date: December 1, 2026, at 10:00 am (ET)** **Objection Deadline: November 24, 2026, at 4:00 pm (ET)**

NOTICE OF GELLERT SEITZ BUSENKELL & BROWN, LLC'S MOTION TO WITHDRAW AS COUNSEL FOR 1548199 ALBERTA LTD. AND ROBERT J. BERTRAM

PLEASE TAKE NOTICE that on November 10, 2026, Gellert Seitz Busenkell & Brown, LLC ("GSBB") filed its *Motion to Withdraw as Counsel for 1548199 Alberta Ltd. and Robert J. Bertram* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that objections to the Motion, if any, are required to be filed with the Court on or before **November 24, 2026, at 4:00 p.m. (ET)** (the "Objection Deadline"). At the same time, you must also serve a copy of any response so as to be received by undersigned counsel on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD **ON DECEMBER 1, 2026 AT 10:00 AM (ET)** BEFORE THE HONORABLE THOMAS M. HORAN, 3rd FLOOR, COURTROOM 7, UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, DELAWARE 19801.

IF YOU DO NOT TAKE THESE STEPS BY THE DEADLINE, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY GRANT OR OTHERWISE DISPOSE OF THE MOTION BEFORE THE SCHEDULED HEARING DATE.

Dated: November 10, 2026 GELLERT SEITZ BUSENKELL & BROWN, LLC

/s/ Michael Busenkell

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Counsel for Claimants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 10, 2026, I caused a true and correct copy of *Gellert Seitz Busenkell & Brown, LLC's Motion to Withdraw as Counsel for 1548199 Alberta Ltd. and Robert J. Bertram* to be electronically filed and served via CM/ECF upon all parties requesting electronic notices in this case and in the manner indicated below:

Via Electronic Mail and Registered Mail International
1548199 Alberta Ltd.
21149 TOWNSHIP RD 524
STRATHCONA COUNTY, AB T8G 2E9
CANADA
rbertram2@icloud.com

Dated: November 10, 2026

By: */s/ Michael Busenkell*
Michael Busenkell (DE 3933)